



May 17, 2017

Ellen Nowak, Chair
Mike Huebsch, Commissioner
Lon Roberts, Commissioner
Public Service Commission of Wisconsin
610 North Whitney Way, 2nd Floor
Madison, WI 53705

Dear Chairperson Nowak and Commissioners Huebsch and Roberts,

As you know, I have worked closely with constituents, stakeholders, and the Public Service Commission of Wisconsin (PSCW) as the Badger-Coulee and CapX2020 high voltage transmission lines (HVTL) went through the PSCW approval process. These transmission lines are a contentious issue in the 32nd Senate District and throughout southwestern Wisconsin. Hundreds of individuals and dozens of communities throughout Wisconsin engaged in the approval process.

Individuals and organizations in the region have been participating in the PSCW process; attending scoping meetings, submitting comments to the draft Environmental Impact Statement, and researching energy planning issues.

In speaking with constituents and organizations in our region, many ratepayers feel they do not have a voice at certain decision points and are unable to access important application materials. As you are aware, area legislators and ratepayers have asked the PSCW to make the following additions to the Application Filing Requirements:

- 1) Enhance the discussion of non-transmission alternatives in Section 2.5 of the PSCW's *HVTL Application Filing Requirements* by requiring applicants to provide detailed, quantified presentations of the economic and environmental benefits residential customers would receive if the total cost over 40 years required to build, finance, operate and maintain the HVTL transmission option were invested, instead, in conservation, energy efficiency and load management. The analysis would include head to head comparison of benefits in terms that ratepayers can understand of the non-transmission, transmission-only and no build options.
- 2) Specify that the discussion of non-transmission alternatives in Section 2.6.1 of the *HVTL Application Filing Requirements* include detailed, quantified estimations of costs and economic and environmental benefits associated with eliminating the need for the applicant's low voltage transmission reliability projects by alternatively targeting

OVER

optimized combinations of energy efficiency, load management and local renewable energy installations including community solar. Alternatives would emphasize individual and community funding, returning benefits to these parties while avoiding the creation of long-term, utility capital debt. The analysis of alternatives must include clear, head to head comparison of benefits with the transmission options in presentations that electric customers and decision makers can easily understand.

- 3) During the review process and in conducting PSCW staff research for the required, Environmental Impact Statement, adhere to §1.11(2)(e) to “study, develop, and describe” least impactful alternatives and “recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources.” PSCW staff would be required to independently examine and compare non-transmission alternatives as required of the applicants in Sections 2.5 and 2.6.1 of the *HVTL Application Filing Requirements* with added incentive to find and recommend viable alternatives.
- 4) To ensure that the PSCW’s HVTL review process produces a confirmable assessment of non-transmission alternatives, the agency would complement the above measures with an impartial, third party cost-benefit analysis adhering to the criteria defined above.

I ask that the PSCW consider the request from ratepayers to provide a cost benefit analysis of non-transmission line alternatives and better involve the public in the approval process. We all have a shared interest in providing a customer-friendly, science-based approach that will improve Wisconsin’s environment and economy.

Additionally, due to the concerns over the current approval process of the Cardinal Hickory Creek HVTL, please record a copy of this letter to docket #05-CE-146.

Thank you for your consideration of this request and feel free to contact me directly if you wish to discuss this issue further.

Sincerely,

A handwritten signature in black ink, appearing to read "Jen Shilling". The signature is fluid and cursive, with the first name "Jen" and last name "Shilling" clearly distinguishable.

Jennifer K. Shilling
State Senator
32nd Senate District